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Presentment Date: September 18, 2019 12:00 PM
Objection Date: September 11, 2019

Attorneys for Defendant Carla Ginsburg

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

CARLA GINSBURG,

Defendant.

Adv. Pro. No. 10-04753 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN IN SUPPORT
OF APPLICATION TO WITHDRAW AS COUNSEL**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with Chaitman LLP, counsel of record to Defendant Carla Ginsburg, (the "Defendant"). I submit this declaration in support of an application for an Order pursuant to

Rule 2090-1(e) of the Local Bankruptcy Rules of this Court: (1) authorizing Chaitman LLP to withdraw as counsel to the Defendant; and (2) granting such other and further relief as the Court deems just and proper. Unless otherwise stated, the foregoing is based on my personal knowledge.

2. The Trustee commenced this adversary proceeding against the Defendant on December 1, 2010 (the “Adversary Proceeding”).

3. Thereafter, the Defendant retained Becker & Poliakoff LLP to represent her.

4. On behalf of the Defendant, while at Becker & Poliakoff, LLP, I filed a Notice of Appearance on March 24, 2011 (ECF Doc. No. 5).

5. On behalf of the Defendant as a partner of Chaitman LLP, I filed a Notice of Appearance and Request for Service of Papers on October 5, 2015 (ECF Doc. No. 43).

6. Differences have arisen which make it impossible for me to continue to represent the Defendant.

7. The Adversary Proceeding will not be disrupted or unduly delayed as a result of this firm’s withdrawal as Defendant’s counsel.

8. Accordingly, cause exists to grant the application authorizing Chaitman LLP to withdraw as counsel for the Defendant.

Dated: August 28, 2019
New York, New York

/s/ Helen Davis Chaitman